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Staff Division: NREAD

Subj: HAZARDOUS WASTE MANAGEMENT

BACKGROUND:

- The Commanding General, Marine Corps Base, has overall program management responsibility for the collection and disposal of hazardous waste by base and base tenants; Marine Corps Air Station, New River and Air Station tenants; the Naval Hospital and the Defense Reutilization and Marketing Office, Camp Lejeune. Ongoing courtesy inspections of work sites where hazardous wastes are handled and stored continue to identify discrepancies which could lead to citations for violations of state environmental regulations promulgated under the Resource Conservation and Recovery Act (RCRA).

- As a result of an inspection on 26 June 1986, the Environmental Protection Agency (EPA) cited the activity for numerous violations of RCRA. Findings of the inspection were referred to the North Carolina Division of Health Services (DHS) for enforcement. DHS issued a compliance order on 26 Feb 1987. A reinspection by EPA on 31 March - 1 April 1987, revealed continued noncompliance in several areas. DHS enforcement action is anticipated.

CURRENT STATUS:

- An activity hazardous waste management plan is being developed through contract with Environmental and Safety Designs, Inc (ENSAFE), an experienced consultant with an excellent reputation within the DOD Community. Draft plan is currently under local review.

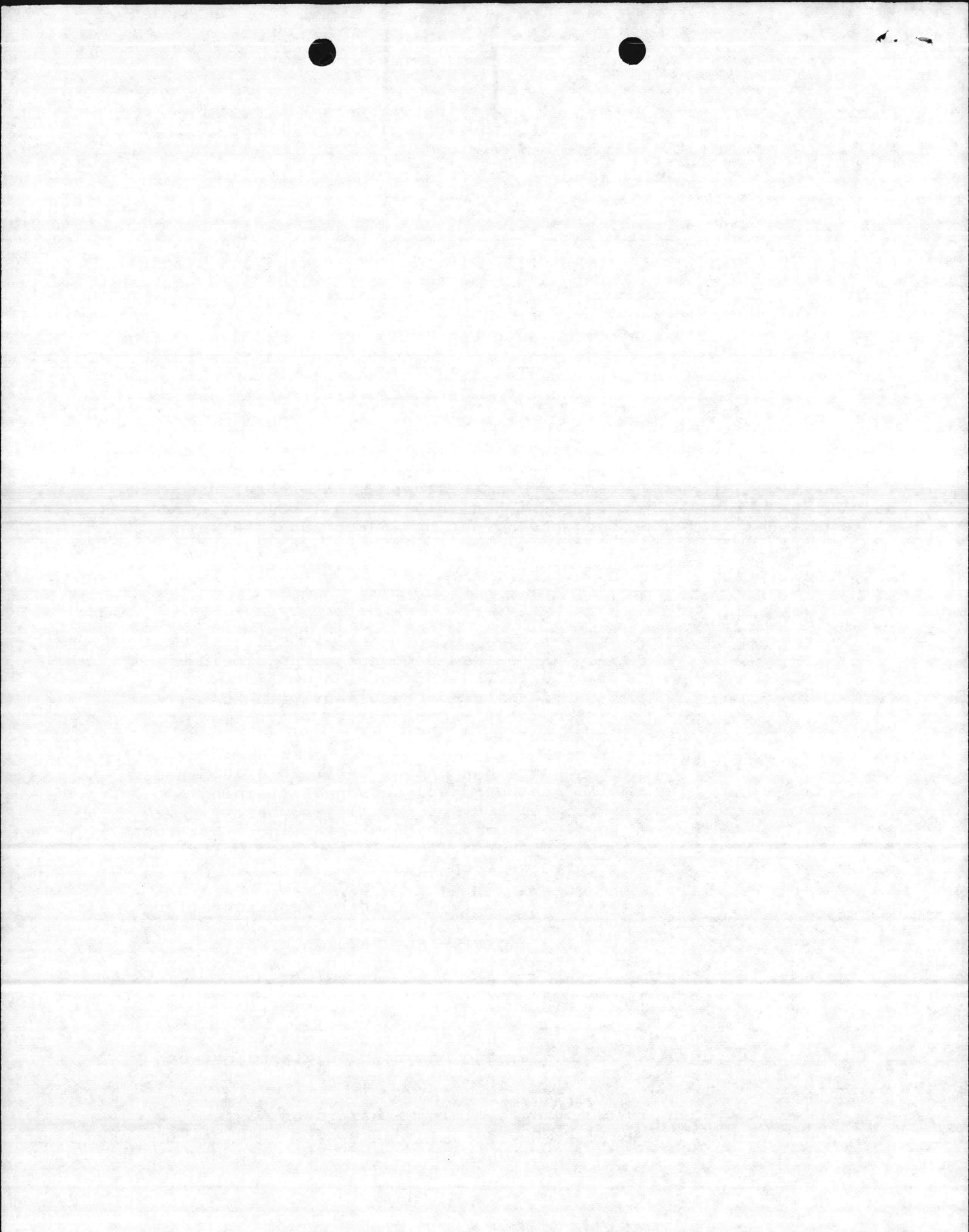
- The Base Hazardous Waste Management Order BO 6240.5 has been revised. The revision strengthens personnel training requirements, requires written SOP for facilities where regulated wastes are routinely handled, and establishes hazardous material disposal officer at the regimental, separate battalion/company and Marine Aircraft Squadron Level.

- Base environmental and civilian training representatives are currently developing a formal training program. Mechanisms for addressing both civilian and military hazardous waste handlers will be incorporated into the training program.

FUTURE ACTION CONTEMPLATED:

- Procedures for internal enforcement of violations of RCRA must be developed. A dialogue has been initiated between AC/S Facilities and SJA.

- Improvement of efforts to minimize hazardous waste generation is needed and is provided in Base Order 6240.5A.



- Improvement of the training program for hazardous waste handlers and managers is an important requirement. Personnel turnover in military shops and in officer billets involved in hazardous waste management is a major problem which must be addressed by the training program.

- Major revisions in procedures for segregation and disposal of oily wastes and upgrading of facilities and equipment are expected. Specific recommendations by the ENSAFE study are currently being evaluated by Base environmental personnel. Contracting out of waste oil collection and disposal is being evaluated.



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